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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

JUL 22 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In re Petition of)
METROCITIES COMMUNICATIONS, INC.)
WWSF-FM, Andalusia, Alabama)
)
For Amendment of § 73.202(b),)
FM Table of Allotments,)
to Delete Channel 251C1 from)
Andalusia, Alabama and to Add)
Channel 251C1 at Wright,)
Florida)

RM - _____

MM Docket No. _____

To: The Chief, Allocations Branch

PETITION FOR RULEMAKING

MetroCities Communications, Inc. ("MetroCities"), licensee of FM station WWSF-FM, Andalusia, Alabama, by its attorneys and pursuant to Section 1.401 of the Commission's rules, hereby petitions for rulemaking to amend the FM Table of Allotments (Section 73.202(b) of the Commission's Rules) to change the community of license of FM Channel 251C1 from Andalusia, Alabama to Wright, Florida, and to modify the WWSF-FM station license accordingly.

This petition is submitted pursuant to Section 1.420(i) of the Commission's Rules and the Report and Order on Modification of FM and TV Authorizations to Specify a New Community of License, 4 FCC Rcd. 4870 (1989), clarified, 5 FCC Rcd. 7094 (1990), which allow a licensee to seek amendment of the Table of Allotments to specify a new community of license for an FM or television station without placing its existing authorization at risk. Under this

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procedure, a change in community of license will be approved if the new allotment is mutually exclusive with the existing allotment, if the allotment change would not deprive the community of its sole broadcasting station, and if the allotment to the new community would further the Commission's FM allotment priorities.¹ 4 FCC Rcd. at 4873-74. Here, the proposed community of license change meets the Commission's criteria.

As shown in the accompanying Engineering Statement by Clarence M. Beverage, the proposed change to Wright, Florida is mutually exclusive with WWSF-FM's existing allotment and currently authorized facilities. Moreover, Andalusia is the community of license of WAAO(FM), Channel 279A (104.7 MHz), WTCG(AM), 1400 kHz, and WWSF(AM) (920 kHz);² therefore, Andalusia will not be deprived of its only FM or other aural service by the relocation. Wright, on the other hand, has no licensed broadcast station. Thus, the proposed amendment would serve the Commission's FM allotment priorities by providing a first local transmission service to Wright, and would leave Andalusia well served by other local transmission services.

¹ The FM allotment priorities are (1) first aural service, (2) second aural service, (3) first local service, and (4) other public interest matters. Co-equal weight is given to priorities (2) and (3). See Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88, 92 (1982).

² WWSF(AM), also licensed to MetroCities, is currently silent during nighttime hours, pursuant to special temporary authorization by the Commission.

Wright, a Census Designated Place located in Okaloosa County, Florida, is an independent community whose substantial population and significant civic life warrant a local service. The 1990 Census records the population of Wright as 18,945 persons and the population of Okaloosa County as 143,776. Both Wright and Okaloosa County have experienced significant growth in recent years: Wright grew by forty-five percent from 1980 to 1990, while Okaloosa County experienced a thirty-one percent increase during the same period.³ Andalusia, in contrast, lost eleven percent of its population during the same period, and has a current population of only 9,269.⁴ Covington County, where Andalusia is located, also declined in population (from 36,850 in 1980 to 36,478 in 1990) between the last two Censuses.

MetroCities believes that the fast-growing Wright community is better able to support WWSF-FM than the much smaller Andalusia community. Wright is the site of the Ocean City-Wright Fire Control District fire-fighting unit and the Wright Elementary School. Wright contains at least ten shopping centers and over forty manufacturing businesses. Wright is also home to several medical care facilities, including Humana Hospital, one of the area's largest employers. Also based in Wright are White-Wilson Medical

³ The 1980 Census figures for Wright and Okaloosa County were 13,011 and 109,920, respectively.

⁴ Andalusia's 1980 Census population was 10,415.

Center, Harbour Oaks Hospital, Westwood Retirement Community, and over twenty professional office buildings housing multiple professional/doctors' offices.

As detailed more fully in the attached Engineering Statement, the proposed change in WWSF-FM's community of license complies with the Commission's technical provisions, including all pertinent distance separation requirements. MetroCities respectfully submits that the proposed change, by providing the growing Wright community with its first local transmission service, would serve the Commission's allotment priorities better than the current Andalusia allotment. Accordingly, MetroCities respectfully requests that Section 73.202(b) of the Commission's Rules be amended in the following manner:

<u>Community</u>	<u>Existing</u>	<u>Proposed</u>
Andalusia, Alabama	251C1, 279A	279A
Wright, Florida	--	251C1

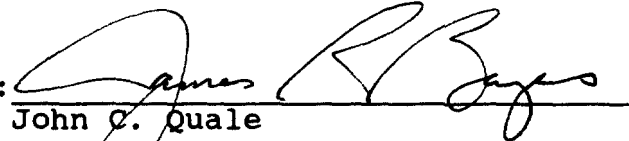
MetroCities further requests that the license of WWSF-FM be modified to specify operation on Channel 251C1 at Wright, Florida. Upon receipt of appropriate Commission authorization, MetroCities will promptly undertake the

necessary modification of the station's facilities to provide service to its new community of license.

Respectfully submitted,

METROCITIES COMMUNICATIONS, INC.

By:


John C. Quale
James R. Bayes
of

WILEY, REIN & FIELDING
1776 K Street, NW
Washington, D.C. 20006
(202) 429-7000

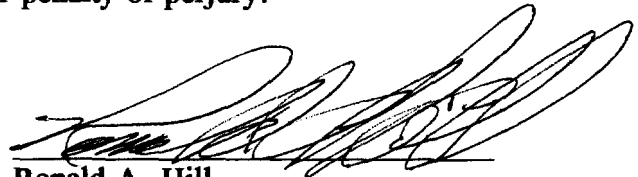
Its Attorneys

July 22, 1993

STATEMENT OF RONALD A. HILL

I am General Manager of FM station WWSF-FM, Andalusia, Alabama, which is licensed to MetroCities Communications, Inc. I assisted in the preparation of a Petition for Rulemaking to change the community of license of WWSF-FM to Wright, Florida. The facts set forth in the Petition concerning the local services and business base in the Wright community were provided by me, based upon information obtained from the Okaloosa County Sheriff's Department, the Economic Development Council of Okaloosa County, the Ocean City-Wright Fire Control District, the United State Postal Service, and the Greater Ft. Walton Chamber of Commerce, and are true and correct to the best of my knowledge and belief.

The foregoing statement is submitted under penalty of perjury.

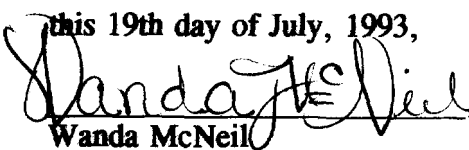


Ronald A. Hill

Date: July 19, 1993

SUBSCRIBED AND SWORN TO before me

this 19th day of July, 1993,



NOTARY PUBLIC

Wanda McNeil

Notary Public of Florida

My commission expires 1/28/94.

**ENGINEERING STATEMENT REGARDING
PETITION FOR RULEMAKING
AMENDMENT TO SECTION 73.202(b) OF THE FCC RULES
TO DELETE CHANNEL 251C1
AT ANDALUSIA, ALABAMA
AND ADD
CHANNEL 251C1 AT
WRIGHT, FLORIDA**

JULY 1993

**ENGINEERING STATEMENT REGARDING
PETITION FOR RULEMAKING
AMENDMENT TO SECTION 73.202(b) OF THE FCC RULES
TO DELETE CHANNEL 251C1
AT ANDALUSIA, ALABAMA
AND ADD
CHANNEL 251C1 AT
WRIGHT, FLORIDA**

JULY 1993

SUMMARY

This Engineering Statement has been prepared on behalf of **MetroCities Communications, Inc.** (**MetroCities**), licensee of FM station WWSF-FM in Andalusia, Alabama, in support of a Petition for Rulemaking to amend *Section 73.202(b)* of the Rules and Regulations, to delete Channel 251C1 at Andalusia, Alabama and add Channel 251C1 at Wright, Florida. The proposal would not be in conflict with existing operations, with regard to the required minimum distance separations found in *Section 73.207* of the FCC Rules.

POPULATION DATA

Andalusia is located in Covington County, Alabama. The 1990 U.S. Census population for Andalusia is 9,269 persons. The 1990 U.S. Census population for Covington County is 36,478 persons. The 1980 Census shows Andalusia with a total population of 10,415 persons and Covington County with a population of 36,850 persons.

Wright is a Census Designated place located in Okaloosa County, Florida. The 1990 U.S. Census population for Wright is 18,945 persons. The 1990 U.S. Census population for Okaloosa County is 143,776 persons. The 1980 Census shows Wright with a total population of 13,011 persons and Okaloosa County with a population of 109,920 persons.

Based on the population statistics enumerated above, the community of Andalusia has experienced an eleven percent drop in population between the 1980 and 1990 Census, whereas Wright has experienced a forty-five percent increase. In a similar fashion, Covington County has experienced a one percent drop in population while Okaloosa County has experienced a thirty-one percent increase in population.

AURAL SERVICES

The community of Andalusia has four authorized aural services:

WKYD(AM) 920 kHz	5 kW ND-D, 0.5 kW DA-N
WTXQ(AM) 1400 kHz	1 kW ND-U
WWSF(FM) Ch 251C1	89 kW @ 312 m HAAT
WAAO(FM) Ch 279A	3 kW @ 100 m HAAT

The community of Wright has no aural services.

SECTION 73.207

An allocation study has been conducted for the proposed Channel 251C1 allocation at Wright, Florida to determine compliance with *Section 73.207* of the Rules. The proposed allocation meets all *Section 73.207* distance separation requirements from the proposed reference coordinates specified herein.

North Latitude:	30° 24' 51"
West Longitude:	86° 37' 40"

Table I, attached, is a printout of the allocation study based on these coordinates. The proposed reference coordinates are located 3.7 kilometers from the U.S. Atlas reference coordinates for Wright at a bearing of 175 degrees True.

CONCLUSION

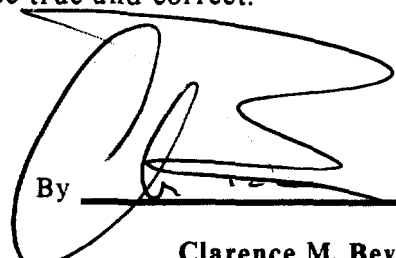
MetroCities proposes an amendment to the Table of Allotments which will bring a first transmission service to Wright, Florida, a community which has experienced a significant growth in population between the 1980 and 1990 U.S. Census.

The allocation meets all *Section 73.207* standards for Channel 251C1 operation and will provide 70 dBu service to Wright, Florida.

In summary, the following changes are proposed to the Table of Allotments:

<u>PRESENT</u>	<u>PROPOSED</u>	<u>COMMUNITIES</u>
251C1, 279A	279A	Andalusia, Alabama
--	251C1	Wright, Florida

The foregoing was prepared on behalf of **MetroCities Communications, Inc.** by Clarence M. Beverage of *Communications Technologies, Inc.*, Marlton, New Jersey, whose qualifications are a matter of record with the Federal Communications Commission. The statements herein are true and correct of his own knowledge, except such statements made on information and belief, and as to these statements he believes them to be true and correct.

By 
Clarence M. Beverage
for Communications Technologies, Inc.
Marlton, New Jersey

SUBSCRIBED AND SWORN TO before me

this 8th day of July, 1993,

Esther G. Sperbeck, NOTARY PUBLIC

ESTHER G. SPERBECK
NOTARY PUBLIC OF NEW JERSEY
MY COMMISSION EXPIRES OCT 15, 1997

TABLE 1
ALLOCATION STUDY - CHANNEL 251C1
WRIGHT, FLORIDA

JULY 1993

Search of Channel 251C1 (98.1 MHz), at N. 30 24 51, W. 86 37 40.

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLEARANCE
ALC	Mobile	AL	248	C	U	119.3	105.0	284.8°	14.3
WABBFM	Mobile	AL	248	C	L	119.3	105.0	284.8°	14.3
WTBB	Bonifay	FL	249	C1	C	109.8	82.0	84.4°	27.8
ALC	Bonifay	FL	249	C1	U	101.6	82.0	71.9°	19.6
WTBB	Bonifay	FL	249	A	L	101.6	75.0	71.9°	26.6
ALC	Andalusia	AL	251	C1	U	64.1	245.0	352.2°	-180.9
WWSF-F	Fort Walton Beach	FL	251	D	C	4.3	0.0	40.6°	4.3
WWSFFM	Andalusia	AL	251	C1	L	64.1	245.0	352.2°	-180.9
ALC	Chickasaw	AL	252	C2	U	167.9	158.0	276.5°	9.9
WDLT	Chickasaw	AL	252	A	L	148.8	133.0	283.9°	15.8
WDLT	Chickasaw	AL	252	C2	C	158.4	158.0	276.9°	0.4
ALC	Panama City	FL	253	C	U	109.8	105.0	84.4°	4.8
WFSY	Panama City	FL	253	C	L	109.8	105.0	84.4°	4.8
ALC	Pensacola	FL	254	C2	V	80.6	79.0	270.2°	1.6
NEW	Pensacola	FL	254	C2	A	81.1	79.0	284.0°	2.1
NEW	Pensacola	FL	254	C2	A	83.6	79.0	277.4°	4.6
NEW	Pensacola	FL	254	C2	A	83.7	79.0	268.8°	4.7
NEW	Pensacola	FL	254	C2	A	81.3	79.0	267.6°	2.3
NEW	Pensacola	FL	254	C2	A	81.1	79.0	267.2°	2.1